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July 11, 2016

VIA ECF and E-mail

Honorable Kimba M. Wood
Senior United States District Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Steven Brown, et al.*
Docket No. S3 16 Cr. 436 (KMW)

Letter Application To Extend Bail Conditions For Imminent Travel

Dear Judge Wood:

We seek to follow United States Magistrate Judge Cott's suggestion (6/28/16, Arraignment Transcript, pp. 18-24) for imminent travel requests of my client Steven J. Brown. At this time for reasons best explained by Pretrial Services but probably as a result of the transfer of oversight of Mr. Brown from New York to California, Pretrial is asking that I now submit travel applications for defendant Brown initially with Your Honor despite my suggestion in my 3:43 p.m., e-mail message of July 7, 2016 to Law Clerk/Deputy Tomasello, copied to the Government and Pretrial.

Pretrial's request is granted. KMW

Steven Brown's livelihood in the movie film business depends on his ability to travel throughout the United States and occasionally Europe to meet with and to enlist talent and sign them to contracts, nurture films by meeting with local authorities and production-related persons and organizations and execute his on-site responsibilities to see that the filming, production and all promotion and produced films are consistent with his and the market place's high professional standards.

Honorable Kimba M. Wood

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Having said that, we are nowhere eliding or opposing an on-going requirement that defendant Brown inform Pretrial and me of his upcoming travel plans and provide whatever information Pretrial requires of his current and future whereabouts as that Office seeks on an ongoing basis until the trial of the issues in the indictment are resolved, a prospect Mr. Brown and I relish.

Of immediate importance to my client is to seek the Court's permission for Mr. Brown to travel to France this week¹ in order to attend key film distribution meetings that were scheduled for his presence in May, 2016. He also needs to be in France this week to attempt to contract with an important French actress for the lead role in an upcoming movie production. These types of travel obligations are essential to Mr. Brown's ability to maintain his movie business and to survive the impact of the Indictment filed against him and the associated press release consequences imposed upon him, both personally and professionally.

Granted.
KMW
PTSO
Ramesar
shall arrange
for return
of defendant's
passport for
duration of this trip
Granted.
KMW

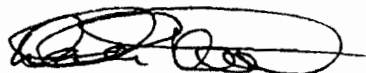
Furthermore, Mr. and Mrs. Brown have had a long-scheduled family wedding in France for this upcoming weekend that is very important to them both and to other family members that the Browns attend.

Accordingly, we seek the Court's permission that the defendant fly to France this week to attend important business meetings and the family wedding mentioned above. He, of course, would provide detailed information to Pretrial Services as required by that Office and/or the Court.

In addition, Mr. Brown will be present in New York City by tomorrow afternoon and is available to appear before Your Honor to answer any questions the Court may have and provide further reassurances of Mr. Brown's commitments and trustworthiness to follow the Court's orders and his bail obligations throughout this process and without fail.

Thank you for your consideration of this request.

Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)
AUSA Richard Cooper (By ECF and email)
PTSO Natasha Ramesar (by email)

7-12-16
SO ORDERED: N.Y., N.Y.

¹ Mr. Brown's passport was surrendered to the SDNY Pretrial Services Officer last week.


KIMBA M. WOOD
U.S.D.J.